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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE ROGER T. BENITEZ)

UNITED STATES OF AMERICA,) CASE NO.: 08CR1167-BEN
))
Plaintiff,) DATE: JUNE 2, 2008
) TIME: 9:00 a.m.
v.))
) NOTICE OF MOTIONS AND MOTIONS:
GRANT YEROOMIAN,))
) (1) TO COMPEL DISCOVERY;
Defendant.) (2) PRESERVE EVIDENCE; AND
) (3) FOR LEAVE TO FILE FURTHER
) MOTIONS
))
))

**TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY:**

PLEASE TAKE NOTICE that on June 2, 2008, at 9:00 a.m., or as soon thereafter as counsel may be heard, defendant, Grant Yeroomian, by and through his attorneys, Kris J. Kraus and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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MOTIONS

Defendant, Grant Yeroomian, by and through his attorneys, Kris J. Kraus and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Compel Discovery;
 - (2) Preserve Evidence; and
 - (3) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: APRIL 25, 2008

s/ KRIS J. KRAUS
KRIS J. KRAUS

Federal Defenders of San Diego, Inc.
Attorneys for Mr. Grant Yeroomian

CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

Rebecca Kanter

Assistant United States Attorney
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Bernard G Skomal

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Dated: April 25, 2008

/s/ KRIS J. KRAUS
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